

WILLKIE FARR & GALLAGHER^{LLP}

1875 K Street, N.W.
Washington, DC 20006-1238

Tel: 202 303 1000
Fax: 202 303 2000

October 9, 2017

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Level 3 Communications, LLC v. AT&T Inc. et al., EB Docket No. 17-227,*
 *File No. EB-17-MD-003***

Dear Ms. Dortch:

Pursuant to the Protective Order entered by the Commission's Enforcement Bureau on August 31, 2017,¹ I hereby submit on behalf of Level 3 Communications, LLC declarations executed by Joseph C. Cavender, Vice President and Assistant General Counsel, Level 3 Communications, LLC, and Nicholas G. Alexander, Associate General Counsel, Level 3 Communications, LLC, as well as Thomas Jones, David P. Murray, Mia Guizzetti Hayes, Gorana Neskovic, and the undersigned of Willkie Farr & Gallagher LLP, all Outside Counsel to Level 3 Communications, LLC, for the purpose of reviewing Confidential Information filed in the above-captioned proceeding.

Please contact me at (202) 303-1214 if you have any questions regarding this submission.

Respectfully submitted,

/s/ Samuel Eckland

Samuel Eckland
Counsel for Level 3 Communications, LLC

¹ Protective Order, *attached to* Letter from Lisa Saks, Assistant Chief, Market Disputes Resolution Division, to Thomas Jones, Counsel for Level 3, and Christopher T. Shenk, Counsel for AT&T, EB Docket No. 17-227, File No. EB-17-MD-003 (Aug. 31, 2017).

Marlene H. Dortch

October 9, 2017

Page 2

cc: Michael J. Hunseder
Christopher T. Shenk
James P. Young
Rosemary McEnery
Lisa Saks
Lisa Boehley

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

LEVEL 3 COMMUNICATIONS, LLC,

Complainant,

v.

AT&T INC., BELLSOUTH
TELECOMMUNICATIONS, LLC,
NEVADA BELL TELEPHONE COMPANY,
PACIFIC BELL TELEPHONE COMPANY,
SOUTHWESTERN BELL TELEPHONE,
L.P., ILLINOIS BELL TELEPHONE
COMPANY, INDIANA BELL TELEPHONE
COMPANY, MICHIGAN BELL
TELEPHONE COMPANY, OHIO BELL
TELEPHONE COMPANY, AND
WISCONSIN BELL TELEPHONE
COMPANY,

Defendants.

File No. EB-17-MD-003
Proceeding No. 17-227

DECLARATION

I, Joseph Cavender, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature: Joseph Cravender
Name: Joseph Cravender
Representing: Level 3 Communications LLC
Title: Vice President & Asst. General Counsel
Employer: Level 3 Communications LLC
Address: 1220 L Street NW, Suite 660
Tel: 571-730-6533 Washington, DC
Date: 10/6/2017 20005

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

LEVEL 3 COMMUNICATIONS, LLC,

Complainant,

v.

AT&T INC., BELLSOUTH
TELECOMMUNICATIONS, LLC,
NEVADA BELL TELEPHONE COMPANY,
PACIFIC BELL TELEPHONE COMPANY,
SOUTHWESTERN BELL TELEPHONE,
L.P., ILLINOIS BELL TELEPHONE
COMPANY, INDIANA BELL TELEPHONE
COMPANY, MICHIGAN BELL
TELEPHONE COMPANY, OHIO BELL
TELEPHONE COMPANY, AND
WISCONSIN BELL TELEPHONE
COMPANY,

Defendants.

File No. EB-17-MD-003
Proceeding No. 17-227

DECLARATION

I, NICHOLAS G. ALEXANDER, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature: NBAlex

Name: NICHOLAS G. ALEXANDER

Representing: LEVEL 3 COMMUNICATIONS, LLC

Title: ASSOCIATE GENERAL COUNSEL

Employer: LEVEL 3 COMMUNICATIONS, LLC

Address: 1220 L ST, NW, WASHINGTON, DC, 20005

Tel: 571-730-6473

Date: 10/6/17

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

v.)

AT&T INC., BELLSOUTH)
TELECOMMUNICATIONS, LLC,)
NEVADA BELL TELEPHONE COMPANY,)
PACIFIC BELL TELEPHONE COMPANY,)
SOUTHWESTERN BELL TELEPHONE,)
L.P., ILLINOIS BELL TELEPHONE)
COMPANY, INDIANA BELL TELEPHONE)
COMPANY, MICHIGAN BELL)
TELEPHONE COMPANY, OHIO BELL)
TELEPHONE COMPANY, AND)
WISCONSIN BELL TELEPHONE)
COMPANY,)

Defendants.)

File No. EB-17-MD-003

Proceeding No. 17-227

DECLARATION

I, Thomas Jones, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature: _____

Name: _____

Representing: _____

Title: _____

Employer: _____

Address: _____

Tel: _____

Date: _____

Thomas Jones

Thomas Jones

Level 3 Communications, LLC

Partner

Wilkie Farr & Gallagher

1875 K St. NW Washington, DC

202-303-1111

October 4, 2017

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

v.)

AT&T INC., BELLSOUTH)

TELECOMMUNICATIONS, LLC,)

NEVADA BELL TELEPHONE COMPANY,)

PACIFIC BELL TELEPHONE COMPANY,)

SOUTHWESTERN BELL TELEPHONE,)

L.P., ILLINOIS BELL TELEPHONE)

COMPANY, INDIANA BELL TELEPHONE)

COMPANY, MICHIGAN BELL)

TELEPHONE COMPANY, OHIO BELL)

TELEPHONE COMPANY, AND)

WISCONSIN BELL TELEPHONE)

COMPANY,)

Defendants.)

File No. EB-17-MD-003

Proceeding No. 17-227

DECLARATION

I, Daniel P. Murray, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature:

David P. Murray

Name:

David P. Murray

Representing:

Level 3 Communications, LLC

Title:

Partner

Employer:

Willkie Farr & Gallagher LLP

Address:

1875 K Street, NW Wash. DC
20006

Tel:

(202) 303-1112

Date:

10/9/17

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

v.)

AT&T INC., BELLSOUTH)

TELECOMMUNICATIONS, LLC,)

NEVADA BELL TELEPHONE COMPANY,)

PACIFIC BELL TELEPHONE COMPANY,)

SOUTHWESTERN BELL TELEPHONE,)

L.P., ILLINOIS BELL TELEPHONE)

COMPANY, INDIANA BELL TELEPHONE)

COMPANY, MICHIGAN BELL)

TELEPHONE COMPANY, OHIO BELL)

TELEPHONE COMPANY, AND)

WISCONSIN BELL TELEPHONE)

COMPANY,)

Defendants.)

File No. EB-17-MD-003

Proceeding No. 17-227

DECLARATION

I, Mina Guzzetti Hayes hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature:

Name:

Representing:

Title:

Employer:

Address:

Tel:

Date:

Mia Girelli Hayes

Mia Girelli Hayes

Level 5 Communications, LLC

Associate

Willkie Tarr & Gallego LLP

1875 K St, NW, WDC 20004

202 303.1197

October 5, 2017

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

v.)

AT&T INC., BELLSOUTH)

TELECOMMUNICATIONS, LLC,)

NEVADA BELL TELEPHONE COMPANY,)

PACIFIC BELL TELEPHONE COMPANY,)

SOUTHWESTERN BELL TELEPHONE,)

L.P., ILLINOIS BELL TELEPHONE)

COMPANY, INDIANA BELL TELEPHONE)

COMPANY, MICHIGAN BELL)

TELEPHONE COMPANY, OHIO BELL)

TELEPHONE COMPANY, AND)

WISCONSIN BELL TELEPHONE)

COMPANY,)

Defendants.)

File No. EB-17-MD-003

Proceeding No. 17-227

DECLARATION

I, GORANA NESKOVIC, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature:

Gorana Neskovic

Name:

GORANA NESKOVIC

Representing:

Level 3 Communications, LLC

Title:

Associate

Employer:

Willkie Farr & Gallagher LLP

Address:

1875 K St. NW, Wash., DC, 20006

Tel:

202-303-1298

Date:

Oct. 6, 2017

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

v.)

AT&T INC., BELLSOUTH)
TELECOMMUNICATIONS, LLC,)
NEVADA BELL TELEPHONE COMPANY,)
PACIFIC BELL TELEPHONE COMPANY,)
SOUTHWESTERN BELL TELEPHONE,)
L.P., ILLINOIS BELL TELEPHONE)
COMPANY, INDIANA BELL TELEPHONE)
COMPANY, MICHIGAN BELL)
TELEPHONE COMPANY, OHIO BELL)
TELEPHONE COMPANY, AND)
WISCONSIN BELL TELEPHONE)
COMPANY,)

Defendants.)

File No. EB-17-MD-003

Proceeding No. 17-227

DECLARATION

I, SAMUEL ECKLAND, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Signature:

Sam Eckland

Name:

SAMUEL ECKLAND

Representing:

LEVEL 3 COMMUNICATIONS, LLC

Title:

ASSOCIATE

Employer:

WILLIE FARR & GALLAGHER LLP

Address:

1875 K ST. NW WASHINGTON, DC 20006

Tel:

202-303-1214

Date:

10/4/2017
